Before theFEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of 2002 Biennial Regulatory Review - Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Notice of Proposed Rulemaking, MM Docket No. 02-277, (rel. Sept. 23, 2002)

To: The Secretary, FCC Commisioners, and Chief, Media Bureau

I'm sure you've been exposed to some drastic and even bombastic language about the future of democracy hanging in the balance of your media ownership rules. A loosening of the regulations may not lead us to the fall of the democractic ideals that we hold sacred, but it will alter the flow of news and information to which we are accustomed.

The rules as they stand now are imbalanced - radio broadcasters may own multiple stations in a market, but newspaper publishers are faced with limitations. As you review the ownership rules, you should consider placing all media companies on a level playing field.

But that playing field should not give powerful conglomerates the ability to gobble up competitors. Mergers are a natural component of a capitalist business society, but limits must remain in place. Without them, I fear that media companies with newspaper and broadcast holdings will only take further steps to please shareholders as their commitment to high-quality, objective news and services erodes.

Executives cry out that such claims are false, and that they would be foolish to tamper with the products that attract the readers/viewers essential to landing advertisers' dollars. But journalists are right to worry that consolidation and the quarterly battle for ever-higher profit margins will result in layoffs. We already have seen a trend toward cross-media cooperation between television and newspapers. During advertising downturns, such as the one we've been mired in since 2000, cost-cutting reigns and media companies attempt to do more with less. Discussions of "the reporter of the future" - one who writes for the newspaper and Web site while appearing on TV - seem to be ideal for budget-conscious media conglomerates. An environment that supports mergers would hasten the reduction of news staff.

Large companies also seek to discredit the idea that there are fewer "voices" in the marketplace. If one looks at the pure number of entities - Web sites, radio stations, broadcast and cable outlets - then that claim is true. But it's also vital to recognize the ownership of the most viewed properties is very much consolidated. The viewpoints of a newspaper's editorial board should remain confined to that paper. In a post-regulated media environment, that same view could filter into radio, television and the Web properties owned by the company. This would be especially damaging for politicians who don't receive the backing of the board. And it's also damaging to citizens who deserve multiple points of view from media outlets.

Lastly, I'll address my concern about the erosion of quality entertainment programming. To save costs, TV and cable networks share programming with increasing frequency. The TV grid can cause double vision because of the number of occasions when the same show appears on different channels and in different time slots. Writers, actors and directors see their place in American culture becoming marginalized. I won't address the economics of producing a television show here. But I will remind you of the grotesque reality shows that fill the networks' schedules. They're cheap to produce and as intellectually satisfying as a Bazooka gum wrapper comic. The proliferation of these programs would accelerate - and that may be the most horrifying ramification of all!!